

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

XIN YUE,	:	
	:	CIVIL NO. 2:20-CV-05099-JMV-MF
Plaintiff,	:	
V.	:	<b>SECOND CONSENT MOTION FOR</b>
	:	<b>EXTENSION OF TIME TO</b>
STEWART LOR,	:	<b>ANSWER, MOVE, OR OTHERWISE</b>
	:	<b>RESPOND TO THE PLAINTIFF'S</b>
Defendant.	:	<b>COMPLAINT</b>
	:	

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Civil Rule 6.1, the Defendant Stewart Lor (“Lor”) respectfully moves for the entry of an order extending by fourteen (14) days the time within which Lor may answer, move, or otherwise respond to the Plaintiff’s Complaint. In support of this motion, Lor states as follows:

1. Lor was served with the Complaint on May 6, 2020.
2. On June 24, 2020, Lor, with the consent of counsel for the Plaintiff, moved to extend the deadline for filing a response to the Complaint by thirty (30) days, from June 29, 2020 to July 29, 2020.
3. On June 25, 2020, the Court granted Lor’s consented-to motion (ECF No. 8).
4. This is Lor’s second request to extend the deadline to respond to the Complaint.
5. This extension is being sought in good faith for a proper purpose and is not intended to unduly or unnecessarily delay these proceedings. Lor has been diligently working to gather information necessary to respond completely to the Complaint. However, limitations on Lor and his counsel due to the COVID-19/Coronavirus pandemic, newly-discovered information relating to possible defenses to the Complaint, and difficulties in communications between Lor

and undersigned counsel because Lor is currently residing in China, have caused unanticipated delays in preparing Lor's response to the Complaint.

6. Prior to filing this motion, undersigned counsel for Lor conferred with counsel for the Plaintiff and the Plaintiff consents to the extension of Lor's deadline to answer, move, or otherwise respond to the Complaint until August 12, 2020.

7. A proposed consent order is attached hereto as Exhibit A.

WHEREFORE, the Defendant Stewart Lor respectfully moves for the entry of an order extending the deadline by which it must answer, move, or otherwise respond to the Complaint until August 12, 2020.

Dated: July 27, 2020

Respectfully submitted,

DEFENDANT  
STEWART LOR

/s/ Michael H. Bernstein

Michael H. Bernstein  
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/s/ Elizabeth R. Leong

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UNITED STATES DISTRICT COURT  
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XIN YUE,

Plaintiff,

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STEWART LOR,

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**CERTIFICATE OF SERVICE**

I, Elizabeth R. Leong, hereby certify and affirm that a true and correct copy of the attached SECOND CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE PLAINTIFF'S COMPLAINT was served via ECF on this 27th day of July, 2020, upon the following:

**JACOB CHEN, ESQ.**  
DAI & ASSOCIATES, P.C.  
1500 BROADWAY, 2200  
NEW YORK, NY 10036  
[jchen@daiassociates.com](mailto:jchen@daiassociates.com)

HOWARD GUTMAN  
LAW OFFICE OF HOWARD GUTMAN  
230 ROUTE 206, SUITE 307  
FLANDERS, NJ 07836

/s/ Elizabeth R. Leong  
Elizabeth R. Leong (NJ Bar ID No.: 017151997)

Dated: Hartford, Connecticut  
July 27, 2020

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

XIN YUE,

Plaintiff,

V.

STEWART LOR,

Defendant.

:  
: CIVIL NO. 2:20-CV-05099-JMV-MF  
:  
:  
: **[PROPOSED]**  
: **CONSENT ORDER**  
:  
:  
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THIS MATTER having been brought before the Court by Robinson & Cole LLP, attorneys for the Defendant Stewart Lor, for an order allowing an extension of time of thirty (30) days within which to answer, move, or otherwise respond to the Plaintiff's Complaint, on notice to and with consent of attorneys for the Plaintiff;

IT IS, this \_\_\_\_\_ day of \_\_\_\_\_, 2020, hereby

**ORDERED** that the Defendant's response to the Plaintiff's Complaint is to be filed on or before August 12, 2020.

SO ORDERED:

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Mark Falk, Chief U.S.M.J.